

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Full Tilt Performance
2041 Highway 71 N
Jackson, Minnesota 56143

ATTENTION:

Terry Hummel
Owner

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Full Tilt Performance (Full Tilt or you) to submit certain information about your operations. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within **thirty (30) calendar days** after you receive this request.

We are issuing this information request under Section 208(a) of the Clean Air Act (CAA), 42 U.S.C. § 7542(a). Section 208(a) authorizes the Administrator of EPA to require the submission of information from any person who is subject to the emission standards for moving sources under Parts A and C of Subchapter II of the CAA, 42 U.S.C. §§ 7521-7554; 7581-7590. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Full Tilt manufactures, sells, and/or distributes motor vehicle engine parts or components in the United States. We are requesting this information to determine whether Full Tilt is complying with Section 203 of the CAA and the regulations promulgated under Subchapter II of the CAA, 42 U.S.C. §§ 7521-7590.

Full Tilt must send all required information to:

Attn: Compliance Tracker, AE-18J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 208(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data." This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

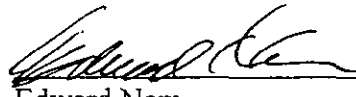
Full Tilt must submit all required information under an authorized signature on the certification language set forth in Appendix D.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Full Tilt to an enforcement action under Section 205 of the CAA, 42 U.S.C. § 7524.

You should direct any questions about this information request to Sarah Clark by email at clark.sarah@epa.gov or by phone at 312-886-9733.

7/13/18
Date


Edward Nam
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.
7. Provide the Statement of Certification (Appendix D) in hard copy form with your response.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in searchable Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel format, and not in image format. If Excel format is not available, then the format you use should allow for data to be used in calculations by a standard spreadsheet program such as Excel. Appendix E, which consists of an Excel workbook, is provided on a compact disk (and hard copy) for your convenience to assist you to organize your responses to Requests 1 through 8. Please use

the Appendix E table format if you are able. If you are not able to use the Appendix E table, then you should create your own table summarizing the requested information, using the attached hard copy of Appendix E as a guide.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this Request for Information will have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or the applicable mobile source regulations, including those at 40 C.F.R. Parts 85, 86, 1039, and 1068, unless otherwise provided in this information request.

1. The terms “document” and “documents” and “documentation” means any object that records, stores, or presents information, and includes: email; writings; memoranda; contracts; agreements; records; or information of any kind, formal or informal, whether handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy. All documents in hard copy shall also include attachments to or enclosures with any document.
2. The term “Full Tilt Performance” or “Full Tilt” or “you” or “your” includes, but is not limited to: any assumed business names, agents, representatives, employees, contractors, or other entities that performed work or acted in any way on behalf of, are related to, or acted at the direction of Full Tilt Performance.
3. The term “catalysts” refers to systems, such as catalytic converters, that contain parts or chemical elements which increase the rate of a chemical reaction but are not one of the original reactants or final products, i.e., are not consumed or altered in the reaction. Catalysts consist of a flow-through structure that is coated with an active metal catalyst and surrounded by a stainless steel housing.

4. The term “diesel particulate filter” or “DPF” refers to an exhaust after-treatment emission control component that physically traps particulate matter (PM) and removes it from the exhaust stream, typically using a porous ceramic or cordierite substrate or metallic filter.
5. The term “electronic control module” or “ECM” means a device that receives inputs from various sensors and outputs signals to control engine, vehicle, or equipment functions. ECM programming relies on calculations and tables of information to provide appropriate outputs. ECM can be a generic term but may refer specifically to the engine control module when discussing emission controls on vehicles and engines. ECMs may be incorporated separately with multiple units or may be combined into a single unit.
6. The term “element of design” means any control system (*e.g.*, computer software, electronic control system, emission control system, computer logic), and/or control system calibrations, and/or the results of systems interaction, and/or hardware items on a motor vehicle or motor vehicle engine, as defined in 40 C.F.R. § 86.094-2.
7. The term “emission control component” means any part or component and its associated fluids, sensors, signals, components, and control systems that function primarily for emission control and whose deviation from original manufacturer specifications and/or failure may significantly increase emissions.
8. The term “engine derate” or “limp-home mode” means an ECM mode that reduces the engine power after the OBD system identifies a problem with an emission-related system.
9. The term “exhaust gas recirculation” or “EGR” refers to an emission control component that directs a portion of engine exhaust back into the engine’s combustion chamber in order to control combustion temperatures and pressures, thereby reducing the production of nitrogen oxides (NO_x). The EGR system may include a cooler, which cools the recirculated exhaust.
10. The term “onboard diagnostics” or “OBD” refers to an ECM that monitors emission control and emission-related components and systems along with certain engine components, such as the fuel delivery system and the engine control module. When the OBD detects a malfunction or deterioration that could affect emissions, it illuminates a malfunction indicator light (MIL) and produces diagnostic trouble codes (DTC) to aid in repair.
11. The term “part or component” includes any part or component intended for use with, or as part of, a motor vehicle or motor vehicle engine (*e.g.*, ECM, element of design, calibration map, tuner, or software that is installed on or designed for use in such vehicles or engines).
12. The term “product” or “products” shall mean any service, part or component, or other item(s), including, but not limited to, engine parts, manifolds, turbos, block plates, straight pipes, power packages, computer tuning, calibrations, elements of design, tuners,

tunes, software coding, or devices, that are manufactured (*i.e.*, created, written, programmed, fabricated, produced, assembled or modified), purchased, imported, distributed, downloaded, offered for sale, sold, provided, and/or installed by Full Tilt that are intended for use with, or as part of, a motor vehicle or motor vehicle engine.

13. The term “selective catalytic reduction” or “SCR” refers to an emission control component that includes systems (the diesel exhaust fluid (DEF) tank, urea quality sensor, DEF injection system, SCR catalyst(s), and other associated sensors), which inject a reductant, such as DEF, into the exhaust stream where it reacts with catalysts to convert NO_x emissions to nitrogen gas (N₂) and water (H₂O).
14. The term “service” means any action to change, affect, modify, bypass, render inoperative, remove, download and/or install one or more part(s) or component(s) (*e.g.*, emission control components) or other item(s), including, but not limited to, engine parts, block plates, straight pipes, power packages, computer tuning, calibrations, elements of design, tuners, tunes, software, code, or devices.
15. The term “tune” means any combination of software programming, calculations, computer logic, tables of information (*e.g.*, fuel timing maps), coding, or other content or information, stored in any form, capable of affecting or controlling an ECM.
16. The term “tuner” means any device or product capable of accessing, altering, or replacing the software programming, calculations, computer logic, tables of information (*e.g.*, fuel timing maps), code, or other content stored within or used by an ECM.

Appendix B

Information You Are Required to Submit to EPA

- Full Tilt must submit the following information pursuant to Section 208 of the CAA, 42 U.S.C. § 7542, as it pertains to activities at any location owned, leased, and/or operated by Full Tilt and regarding certain products that Full Tilt manufactured, purchased, imported, distributed, offered for sale, sold, provided, and/or installed from **June 1, 2015 through the date of this request**:
- 1. In an **electronic, unlocked spreadsheet** (see Appendix E, Worksheet 1), list, by identifying product name, each product (which includes services, as defined in Appendix A: Definitions, Paragraph Nos. 12 and 14) that:
 - (a) Replaces, defeats, deletes, deactivates, bypasses, blocks, renders inoperative, interferes with, alters the operation or performance of, or allows for the removal of any motor vehicle or motor vehicle engine's emission control component, element of design, or emission related part including, but not limited to, the EGR system, DPF system, catalyst system, OBD, SCR (including DEF) systems, or sensors, signals, or records related to such systems;
 - (b) Simulates, or can be programmed to simulate, the operation of any motor vehicle or motor vehicle engine's emission control component, element of design, and/or emission related part (see Request 1a); and/or
 - (c) Modifies, or can be programmed to modify, motor vehicle engine operating parameters, such as injection timing, fuel pressure, pulse width, fuel quantity, air/fuel ratio, air temperature, and/or air flow, emission control parameters, and/or OBD functions including, but not limited to, those parameters sensed or controlled by the ECM.

Examples of such products may include, but are not limited to, services, tunes, tuners, intakes, manifolds, or turbochargers.

- 2. In an **electronic, unlocked spreadsheet** (see Appendix E, Worksheet 1), for each product identified in response to Request 1 above, provide the following information:
 - (a) product number, item code, or other unique identifier used by Full Tilt;
 - (b) product description;
 - (c) product manufacturer's name and address;
 - (d) product supplier's name and mailing address(es) (if different than manufacturer's) as listed on the shipping label(s) associated with the product's original packaging;
 - (e) product applications by vehicle make(s), vehicle model(s), engine model(s), and engine year(s);
 - (f) indicate whether Full Tilt indicated to customers that the product is only for testing, maintenance, racing, off-road, or other restricted use (if yes, specify which restricted use); and

- (g) California Air Resources Board Executive Order number, if any.
3. In an **electronic, unlocked spreadsheet** (see Appendix E, Worksheet 1), for each product identified in response to Request 1 above, provide the following information for each calendar year (or partial year if full year not yet available) as it pertains to the period from June 1, 2015 through the date of this request:
- (a) average price Full Tilt paid for each product;
 - (b) average Full Tilt sale price;
 - (c) quantity of product that was manufactured by Full Tilt;
 - (d) quantity of product that was purchased and/or imported by Full Tilt;
 - (e) quantity of product that was sold or offered for sale by Full Tilt;
 - (f) quantity of product that was installed by Full Tilt on motor vehicles or motor vehicle engines owned by you; and
 - (g) quantity of product that was performed or installed by Full Tilt on motor vehicles or motor vehicle engines not owned by you.
4. In an **electronic, unlocked spreadsheet** (see Appendix E, Worksheet 1), for each product identified in response to Request 1 that is a tune sold without a tuner, identify all compatible tuners.
5. In an **electronic, unlocked spreadsheet** (see Appendix E, Worksheet 1), for each product identified in response to Request 1 that is a tune or a tuner sold with tunes, indicate with a "yes" or "no" whether the product can do any of the following:
- (a) alter, disable, or allow the removal of an EGR;
 - (b) alter, disable, or allow the removal of a DPF;
 - (c) alter, disable, or allow the removal of a catalyst;
 - (d) alter, disable, or allow the removal of a SCR system;
 - (e) alter fuel timing maps;
 - (f) alter motor vehicle engine calibrations for fuel injection pulse width;
 - (g) alter motor vehicle engine calibrations for fuel quantity (amount of fuel injected into the cylinder per stroke);
 - (h) alter motor vehicle engine calibrations for air/fuel ratio;
 - (i) bypass or alter OBD parameters to prevent DTCs or MILs from being recorded or illuminated; or
 - (j) bypass or alter OBD parameters to prevent engine derating (limp-home mode).
6. In an **electronic, unlocked spreadsheet** (see Appendix E, Worksheet 1), for each product identified in response to Request 1 that is not a tune or a tuner, identify:
- (a) all stock components each product replaces;
 - (b) whether the product requires tuning or a tuner;
 - (c) whether the product physically replaces, removes, or blocks off the EGR system;
 - (d) whether the product allows the EGR system to operate in its original motor vehicle engine manufacturer (OEM) stock configuration;
 - (e) whether the product allows the DPF, DOC, and SCR systems to operate in their

- OEM stock configuration;
 - (f) whether the product physically replaces or allows the removal of sensors connected to the ECM or OBD system; and
 - (g) whether the product allows the ECM or OBD system to operate in their OEM stock configuration.
7. In an **electronic, unlocked spreadsheet** (see Appendix E, Worksheet 1), for each product identified in response to Request 1 that is not a tune or a tuner describe how each product differs from the stock components, configuration, and operation.
 8. In an **electronic, unlocked spreadsheet** (see Appendix E, Worksheet 2), or in a spreadsheet exported from an invoice or sales management program, for each product identified in response to Request 1 that Full Tilt sold during the period June 1, 2015 through the date of this Request, provide the name, address, and phone number of the purchaser, any invoice data, and all other commercial information for each sale to a purchaser.
 9. For products identified in response to Request 1, for the period June 1, 2015 through the date of this request, provide all records, such as copies of all receipts or invoices, organized by calendar year, for any and all products that were:
 - (a) Manufactured by you;
 - (b) Purchased or imported by you;
 - (c) Sold by you;
 - (d) Installed by you on vehicles owned by you; and
 - (e) Performed or installed by you on vehicles not owned by you.
 10. For products identified in response to Request 1, provide the following:
 - (a) A list of media through which Full Tilt has advertised and/or provided product operating or installation instructions (i.e. website, social media, newspaper, verbal, trucking shows, conventions *etc.*), specifying the name of the media and/or date of trucking show or convention;
 - (b) A list of the Universal Resource Locators (URLs) for any website or social media page that you use or have used to advertise and/or provide product operating or installation instructions for any of the products and/or facilitate sales;
 - (c) Copies of any advertisements to sell, distribute, or install each product, including advertisements on websites and in other media; and
 - (d) Copies of any installation, owner, and/or operation instructions, guides, or manuals for each product.
 11. For each product identified in response to Request 1 above, if Full Tilt has indicated that a product is only for testing, maintenance, racing, off-road, or other restricted use, provide a detailed description of the mechanisms, if any, that Full Tilt has implemented to ensure that the product is only used for such purposes, with any and all supporting documentation.

12. For each product identified in response to Request 1 above, state whether you or any other entity conducted tests measuring emissions of hydrocarbons (HC), carbon monoxide (CO), NO_x, and/or PM, including tests that measure the impact of the product on a vehicle's emission control components or elements of design. For each test, provide the following:
 - (a) A description of the test, including identification of the component and vehicle, U.S. EPA engine family, name of the vehicle, test equipment, test protocols, and calibration procedures; and
 - (b) A copy of the test report which includes the date and location of the test, the name and position of the person who conducted the test, and the test results.
13. For each product identified in response to Request 1 above, state whether you or the manufacturer submitted an application for an Executive Order to the California Air Resources Board and provide a copy of the application for each product. State whether each component received an Executive Order exempting the component from California's emission control system anti-tampering law, California Vehicle Code § 27156. If the component received an Executive Order, provide the Executive Order number and state whether the California Air Resources Board required you to change the component or application in order to receive approval.
14. Provide the name and address of each location where you have stocked and/or are currently stocking each of the products identified in response to Request 1. The term "stocked" or "stocking" shall mean the temporary or long-term storage of materials for potential use, sale, or delivery. This definition includes, but is not limited to, the storage of materials within warehouses, vehicles, and/or shipping containers.
15. For the period from June 1, 2015 through the date of this request, provide the name and address of all distributors, or dealers, of Full Tilt products identified in response to Request 1, who have distributed, sold, and/or installed any such products. For each distributor, or dealer, identify the products and provide the quantity of each product sent to the distributor, or dealer, each year.
16. For the period from June 1, 2015 through the date of this request, provide contacts and addresses of any and all of your current and previous offices, agents, subsidiaries or affiliates and the role and relationship of each such office, agent, subsidiary, and affiliate with respect to Full Tilt.
17. Identify all persons consulted or who provided information in responding to this information request including the title(s) of the individual and their relation to Full Tilt (e.g., employee, contractor) and the request(s) to which each individual responded or provided information.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 208 of the CAA, 42 U.S.C. § 7542, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 208(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

Appendix D
Statement of Certification

You are submitting the enclosed documents in response to the U.S. Environmental Protection Agency's ("EPA") Request for Information, issued pursuant to Section 208(a) of the Clean Air Act, to determine compliance with the Clean Air Act and its affiliated regulations.

I certify that I am fully authorized by _____ [corporate affiliation] to provide the above information on its behalf to EPA.

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to 18 U.S.C. §§ 1001 and 1341.

Date: _____

Name (Printed): _____

Signature: _____

Title: _____

Appendix E Table Format

Appendix E - Worksheet 1

Please populate the workbook with your responses to **Requests 1** through **7** in accordance with all instructions provided in Appendix A. **Requests 1** through **7** are summarized in Appendix E for your convenience only. The Request summaries in Appendix E are not substitutes for the full text of the Requests in Appendix B.

	A
3	1
4	Product Name
5	

	B	C	D	E	F	G
3	2a	2b	2c		2d	
4	Part Number	Product Description	Product Manufacturer Name	Product Manufacturer Address	Product Supplier's Name	Product Supplier's Address
5						

	H	I	J	K	L	M
3	2e				2f	2g
4	Vehicle Make(s)	Vehicle Model(s)	Engine Model(s)	Engine Year(s)	Advertised For Restricted Use Only (yes/no. If yes, specify which restricted use)	CARB E.O. Number
5						

	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC
3	3a				3b				3c				3d			
4	Average Price Paid				Average Sale Price				Quantity Manufactured				Quantity Purchased and/or Imported			
5	6/1/2015- 12/31/2015	1/1/2016- 12/31/2016	1/1/2017- 12/31/2017	1/1/2018- date of RFI	6/1/2015- 12/31/2015	1/1/2016- 12/31/2016	1/1/2017- 12/31/2017	1/1/2018- date of RFI	6/1/2015- 12/31/2015	1/1/2016- 12/31/2016	1/1/2017- 12/31/2017	1/1/2018- date of RFI	6/1/2015- 12/31/2015	1/1/2016- 12/31/2016	1/1/2017- 12/31/2017	1/1/2018- date of RFI

	AD	AE	AF	AG	AH	AI	AJ	AK	AL	AM	AN	AO
3	3e				3f				3g			
4	Quantity Sold or Offered for Sale				Quantity Installed on motor vehicles or motor vehicle engines owned by you				Quantity Performed or Installed on motor vehicles or motor vehicle engines not owned by you			
5	6/1/2015- 12/31/2015	1/1/2016- 12/31/2016	1/1/2017- 12/31/2017	1/1/2018- date of RFI	6/1/2015- 12/31/2015	1/1/2016- 12/31/2016	1/1/2017- 12/31/2017	1/1/2018- date of RFI	6/1/2015- 12/31/2015	1/1/2016- 12/31/2016	1/1/2017- 12/31/2017	1/1/2018- date of RFI

	AP
3	4
4	All Compatible Tuners
5	

	AQ	AR	AS	AT	AU
3	5a	5b	5c	5d	5e
4	Alter, Disable, or Allow Removal of EGR? (yes/no)	Alter, Disable, or Allow Removal of DPF? (yes/no)	Alter, Disable, or Allow Removal of catalyst? (yes/no)	Alter, Disable, or Allow Removal of SCR? (yes/no)	Alter Fuel Timing Maps? (yes/no)
5					

	AV	AW	AX	AY	AZ
3	5f	5g	5h	5i	5j
4	Alter Fuel Injection Pulse Width? (yes/no)	Alter Fuel Injection Quantity? (yes/no)	Alter Air/Fuel Ratio? (yes/no)	Bypass/Alter OBD to Prevent DTCs/MILs? (yes/no)	Bypass/Alter OBD to Prevent Derate? (yes/no)
5					

	BA	BB	BC	BD	BE	BF	BG
3	6a	6b	6c	6d	6e	6f	6g
4	Stock Components Product Replaces	Requires Tuning (yes/no)	Physically Replaces/Removes/Blocks EGR? (yes/no)	Allows EGR to Operate in OEM Stock Configuration? (yes/no)	Allows DPF/DOC/SCR to Operate in OEM Stock Configuration? (yes/no)	Physically Replaces or Allows the Removal of Sensors connected to ECU or OBD System? (yes/no)	Allows the ECU or OBD system to operate in OEM Stock Configuration? (yes/no)
5							

	BH
3	7
4	Describe How Product Differs from Stock Components, Configuration, or Operation.
5	

Appendix E - Worksheet 2
Request 8

	A	B	C	D	E	F	G	H
3	Product Name	Order No	Order Date	Billing First Name	Billing Last Name	Shipping Cost	Total	Shipping Date

	I	J	K	L	M
3	Billing Address	Billing City	Billing State	Billing Zip	Billing Phone

	N	O	P	Q	R	S	T
3	Shipping First Name	Shipping Last Name	Shipping Address	Shipping City	Shipping State	Shipping Zip	Shipping Phone

	U	V	W
3	SKU	Item Price	Amount

CERTIFICATE OF MAILING

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified

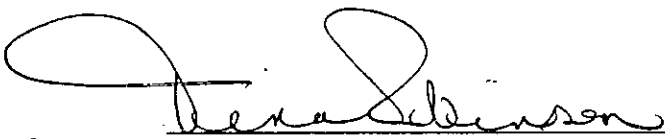
Mail, Return Receipt Requested, to:

Terry Hummel
Full Tilt Performance
2041 Highway 71 N
Jackson, Minnesota 56143

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by E-mail to:

Sarah Kilgriff
Manager
Land and Air Compliance Section
sarah.kilgriff@state.mn.us

On the 16th day of July 2018.


Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 70150640000459656060